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POLLUTION REPORT
MARK TWAIN INDUSTRIES, WEST FRANKFORT, IL

Date: June 15, 1994
From: Thomas Bloom, OSC, EERB, Response Section II
To: R. Karl, EERB ✓
D. Bruce, EERB
J. Cisneros, EERB
P. Schwebke, ESS
T. Johnson, OSWER
T. Turner, ORC
T. Edmondson, IEPA

Date: April 4, 1994, through April 6, 1994
Subject: Time Critical Removal Action at the Mark Twain
Industries Site, West Frankfort, Franklin County, IL

Polrep No: 5th and final
Site No: ZE
DO No: PRP Lead
Response
Authority: CERCLA
NPL Status: Site is not NPL
State Notification: IEPA notified
Status of Action Memorandum: Complete
Start Date: September 27, 1993

I SITUATION:

Mark Twain Industries is located in an industrial park in West Frankfort, IL. The Mark Twain manufacturing plant consists of two warehouse-type buildings which are used to form and assemble pleasure boats. Currently, the smaller building (transportation building) is used to store boat molds and equipment. In the transportation building, located in three rooms and one equipment bay are 124 containers (with capacity 15 gallons or less) and 191 55-gallon drums. Several of the drums are deteriorated and in an unsafe condition (bulging). Many drums have flammable liquids and one drum is suspected to have toluene diisocyanate (TDI), which is a water reactive waste. Access to the building and containers is unrestricted and the threat of fire or explosion exists.

From 1980 until 1990 Mark Twain Industries operated a pleasure boat manufacturing facility. The manufacturing process of fiber glass molding, foam generation, carpentry, upholstering, and painting was employed. Acetone, which was used to clean air guns, was the primary waste generated. In addition, waste paints, glues, solvents and other flammable liquids were generated. Sometime in late 1990 Mark Twain Industries ceased operation, and materials and wastes were left behind.

The Illinois Environmental Protection Agency (IEPA), referred the Mark Twain Industries site to Emergency and Enforcement Response Branch (EERB) in a memo dated July 27, 1993. EERB conducted a site assessment on September 1, 1993.

The property was leased to Crown Line Boats, Inc.. Crown Line Boats Inc. manufactures pleasure boats employing a process similar to the one described above. Between phase II and phase III of the removal operation, Crown Line Boats, Inc., moved to another facility. On April 4, 1994, the property was not in use.

On September 28, 1993, the potential responsible party (PRP) signed an Administrative Order of Consent (AOC) to perform the time critical removal action. On October 7, 1993, the initial PRP work plan and health and safety plan was amended to include phase II of the removal action. On April 4, 1994, the revised PRP work plan and health and safety plan was amended to include phase III of the removal action. Oversight of removal activities was performed by the U.S. EPA On-Scene Coordinator (OSC).

II ACTION TAKEN:

On April 4, 1994 PRP contractors: Walker Engineering, and Central States Environmental Services (CSES), Inc., completed phase II of the removal action. Remaining phase II activities included with completion of consolidation of wastes within compatible groups. Flammable liquids containers and drums were poured or pumped from one container or drum into another to completely fill remaining drums. Partially full inert and caustic materials were also combined into their respective drums.

Phase III activities began on April 4, 1994. Labeling, manifesting, and loading of all drums containing caustic solid compounds, caustic liquid compounds, flammable liquid compounds, inert liquid compounds, and inert solid compounds was completed on that day. CSES used a semi-truck to transport the waste to LWD, Inc. in Calvert City, Kentucky, for incineration. The shipment of wastes from MTI arrived the following day, April 5, 1994. All empty drums were crushed and loaded for disposal at Daubs Landfill in Fairfield, IL.

On April 5, 1994, the remaining drums containing flammable solids were labeled and manifested. On April 6, 1994, the drums containing flammable solids were loaded and transported by semi-truck, to LWD, Inc., Calvert City, KY.

Containment booms and plastic materials that covered the floor were inspected to determine if they had been in contact with any liquids. The containment booms and plastic floor coverings were found not to be contaminated. Therefore, these materials were disposed of at the Daubs Landfill.

All three bays and three rooms of the Transportation Building were then swept clean and the building was secured.

Prior to the start of phase III operations, the site health and safety plan was amended to include the consolidation and the load-out operations.

III FUTURE ACTIONS:

The OSC has received a Completion Report from the PRPs consultant and has reviewed and commented on the report. The OSC is scheduled to receive a revised Completion Report from the PRP's consultant. When the revised Completion Report is considered final, the OSC will complete a Notice of Completion in accordance with Section XVII of the AOC.

IV RESULTS ACHIEVED:

Phase I

- * Completion of the work plan and health & safety plan
- * Preparation of center bay for drum staging area
- * Moving and overpaking unsafe drums located in the transportation building
- * Securing transportation building

Phase II

- * Modification of initial work plan and health and safety plan to include phase II activities
- * Inventory of all containers and drums
- * Sampling and field screening of containers and drums
- * Restaging drums into groups based on probable disposal method
- * Compositing samples within disposal groups and lab analysis of composited samples.
- * Consolidation of partially filled containers within disposal groups

Phase III

- * Revision of phase II work plan and health and safety plan to address phase III activities
- * Arranging for proper disposal of wastes
- * Proper labeling all drums of waste

- * Manifesting wastes for shipment
- * Load-out operations
- * Transport and disposal at an approved facility
- * Crushing and loading of empty drums for disposal at landfill
- * Sweeping and securing transportation building

V KEY ISSUES:

During review of the PRP's Final Report, OSC noted that the report was missing an estimate of total PRP costs incurred by complying with the AOC. The cost estimate is required in Section V, 2, 2.5 Final Report of the AOC. Presently, the PRP's consultant is sending the OSC the missing cost estimates to be incorporated into the Final Report. The OSC intends to complete the Notice of Completion when the missing documents are received.